

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: PHARMACEUTICAL)
INDUSTRY AVERAGE)
WHOLESALE PRICE LITIGATION)
_____)

MDL No. 1456
Master File No. 1:01-CV-12257-PBS
Sub-Category Case No. 1:08-CV-11200

THIS DOCUMENT RELATES TO:)
United States ex rel. Linnette Sun and)
Greg Hamilton, Relators)
v.)
Baxter Healthcare Corporation)
_____)

Judge Patti B. Saris

STIPULATION OF DISMISSAL WITH PREJUDICE

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Linnette Sun and Greg Hamilton (collectively "Relators Sun and Hamilton") and Defendant Baxter Healthcare Corporation ("Defendant", and together with Relators collectively, the "Parties") hereby stipulate to the entry of an order dismissing with prejudice all of Sun's remaining claims under 31 U.S.C. § 3730(h) and her related statutory and common law claims for retaliation in the above-captioned civil action, with the Parties to bear their own respective costs and attorneys' fees.

Dated: June 9, 2015

Respectfully submitted,

RELATORS LINNETTE SUN and
GREG HAMILTON

DEFENDANT BAXTER HEALTHCARE
CORPORATION

/s/ David J. Chizewer
David J. Chizewer
GOLDBERG KOHN LTD.
55 East Monroe Street – Suite 3300
Chicago, Illinois 60603
(312) 201-4000

/s/ Merle M. DeLancey
Merle M. DeLancey
Daniel A. Broderick
DICKSTEIN SHAPIRO LLP
1825 Eye Street, N.W.
Washington, DC 20006-2403
(202) 420-2200

Mark Allen Kleiman
LAW OFFICE OF
MARK ALLEN KLEIMAN
2907 Stanford Avenue
Venice, California 90292
(310) 306-8094

Frederick M. Morgan, Jr.
Jennifer M. Verkamp
MORGAN VERKAMP LLC
700 Walnut Street – Suite 400
Cincinnati, Ohio 45202-2015
(513) 651-4400

Lauren John Udden
LAW OFFICES OF
LAUREN JOHN UDDEN
15 West Carrillo Street – Suite 101B
Santa Barbara, California 93101
(805) 879-7544

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on June 9, 2015, he caused a true and correct copy of the foregoing **STIPULATION OF DISMISSAL WITH PREJUDICE** to be served via the Court's ECF/electronic mailing system and LexisNexis File & Serve upon all parties of record.

/s/ David J. Chizewer